

**LABATON SUCHAROW LLP**

Thomas A. Dubbs  
Carol C. Villegas  
Michael P. Canty  
Jeffrey A. Dubbin (SBN 287199)  
Aram M. Boghosian  
140 Broadway  
New York, New York 10005

*Lead Counsel to Securities Lead Plaintiff and  
the Proposed Class*

**MICHELSON LAW GROUP**

Randy Michelson (SBN 114095)  
220 Montgomery Street, Suite 2100  
San Francisco, California 94104

*Local Bankruptcy Counsel to Securities Lead  
Plaintiff and the Proposed Class*

**LOWENSTEIN SANDLER LLP**

Michael S. Etkin (*pro hac vice*)  
Andrew Behlmann (*pro hac vice*)  
Scott Cargill  
Colleen Maker  
One Lowenstein Drive  
Roseland, New Jersey 07068

*Special Bankruptcy Counsel to Securities  
Lead Plaintiff and the Proposed Class*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

- ☒ Affects Both Debtors  
☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric Company

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**SECURITIES LEAD PLAINTIFF'S REQUEST  
FOR JUDICIAL NOTICE IN SUPPORT OF  
SECURITIES LEAD PLAINTIFF'S MOTION  
TO APPLY BANKRUPTCY RULE 7023 AND  
CERTIFY A LIMITED CLASS**

1 Public Employees Retirement Association of New Mexico (“**Securities Lead Plaintiff**”  
2 or “**PERA**”), the court-appointed lead plaintiff in the securities class action captioned as *In re*  
3 *PG&E Corporation Securities Litigation*, Case No. 18-03509 (the “**Securities Litigation**”)  
4 pending in the U.S. District Court for the Northern District of California (the “**District Court**”),  
5 on behalf of itself and the proposed class it represents in the Securities Litigation (the “**Class**”),  
6 together with York County on behalf of the County of York Retirement Fund, City of Warren  
7 Police and Fire Retirement System, and Mid-Jersey Trucking Industry & Local No. 701 Pension  
8 Fund, in connection with Securities Lead Plaintiff’s Memorandum of Points And Authorities in  
9 Support of Motion To Apply Bankruptcy Rule 7023 And Certify A Limited Class filed herewith  
10 (the “**Motion**”), hereby requests the Court to take judicial notice pursuant to Federal Rule of  
11 Evidence 201, as made applicable to this proceeding by Bankruptcy Rule 9017, of the following  
12 facts:

- 13 1. Attached as **Exhibit A** hereto is a true and correct copy of the PG&E Corporation  
14 Articles of Incorporation dated June 22, 2020, available at  
15 [http://www.pgecorp.com/aboutus/corp\\_gov/pdfs/Corporation\\_ArticlesofIncorp.pdf](http://www.pgecorp.com/aboutus/corp_gov/pdfs/Corporation_ArticlesofIncorp.pdf).
- 16 2. Attached as **Exhibit B** hereto is a true and correct copy of the PG&E Form 10-K (filed  
17 July 30, 2020), available at [http://investor.pgecorp.com/financials/sec-filings/sec-filings-](http://investor.pgecorp.com/financials/sec-filings/sec-filings-details/default.aspx?FilingId=14296562)  
18 [details/default.aspx?FilingId=14296562](http://investor.pgecorp.com/financials/sec-filings/sec-filings-details/default.aspx?FilingId=14296562).
- 19 3. Attached as **Exhibit C** hereto is a true and correct copy of the PG&E Form 8-K (filed  
20 July 2, 2020), available at [http://investor.pgecorp.com/financials/sec-filings/sec-filings-](http://investor.pgecorp.com/financials/sec-filings/sec-filings-details/default.aspx?FilingId=14253759)  
21 [details/default.aspx?FilingId=14253759](http://investor.pgecorp.com/financials/sec-filings/sec-filings-details/default.aspx?FilingId=14253759).
- 22 4. Attached as **Exhibit D** hereto is a true and correct copy of the PG&E Form 8-K (filed  
23 August 3, 2020), available at [http://investor.pgecorp.com/financials/sec-filings/sec-filings-](http://investor.pgecorp.com/financials/sec-filings/sec-filings-details/default.aspx?FilingId=14303890)  
24 [details/default.aspx?FilingId=14303890](http://investor.pgecorp.com/financials/sec-filings/sec-filings-details/default.aspx?FilingId=14303890).
- 25 5. Attached as **Exhibit E** hereto is a true and correct copy of the PG&E Form S-3  
26 Registration Statement (filed July 27, 2020), available at  
27 <http://investor.pgecorp.com/financials/sec-filings/sec-filings->  
28

1 details/default.aspx?FilingId=14289105.

2 In the context of the Motion filed herewith, the above documents are “sources whose  
3 accuracy cannot reasonably be questioned.” Fed. R. Evid. 201. As indicated by the web  
4 addresses above, all of the above documents are available from Debtors’ own public records.  
5 Further, the Court may take judicial notice of Debtors’ SEC filings. *See In re Davies*, No. 11-ap-  
6 01001, 2012 WL 370689, at n.7 (B.A.P. 9th Cir. Jan. 12, 2012), *aff’d*, 565 F. App’x 630 (9th Cir.  
7 2014) (affirming bankruptcy court order, which took judicial notice of “copies of SEC filings”);  
8 *In re Hoopai*, No. 04-02511, 2007 WL 2460762, at \*3 (Bankr. D. Haw. Aug. 27, 2007) (“SEC  
9 filings fall within [the] category of public records that can be judicially noticed.”)

10  
11 Dated: September 28, 2020

Respectfully submitted,

12 **MICHELSON LAW GROUP**

13 By: /s/ Randy Michelson  
14 Randy Michelson (SBN 114095)

15 *Local Bankruptcy Counsel to Securities Lead*  
16 *Plaintiff and the Class*

- and -

17 **LABATON SUCHAROW LLP**

18 *Lead Counsel to Securities Lead Plaintiff and the*  
19 *Class*

- and -

20 **LOWENSTEIN SANDLER LLP**

21 *Special Bankruptcy Counsel to Securities Lead*  
22 *Plaintiff and the Class*

- and -

24 **WAGSTAFFE, VON LOEWENFELDT, BUSCH**  
25 **& RADWICK, LLP**

26 *Liaison Counsel for the Class*

27 - and -  
28

**ROBBINS GELLER RUDMAN & DOWD LLP**

*Counsel for the Securities Act Plaintiffs*

- and -

**VANOVERBEKE, MICHAUD & TIMMONY,  
P.C.**

*Additional Counsel for the Securities Act Plaintiffs*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28